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Alex J. De Castroverde
Nevada Bar No. 6950
Orlando De Castroverde
Nevada Bar No. 7320
DE CASTROVERDE LAW GROUP
1149 S. Maryland Parkway
Las Vegas, Nevada 89104
Phone: (702) 383-0606
Facsimile: (702) 383-8741
Email: Kimberly@dlgteam.com
Email: Millie@dlgteam.com
Attorney for Plaintiff Teresa De Jesus Santoyo Rodriguez

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TERESA DE JESUS SANTOYO
RODRIGUEZ,

Plaintiff,

v.

OUMID LINA AKBAR; THE TJX
COMPANIES, INC; DOES I-X, inclusive,
and ROE CORPORATIONS I-X, inclusive,

Defendants,

CASE NO.: 2:23-cv-1520

**STIPULATION AND ORDER TO
EXTEND DISCOVERY**

[FIRST REQUEST]

Plaintiff, TERESA DE JESUS SANTOYO RODRIGUEZ, and Defendants, OUMID LINA AKBAR and THE TJX COMPANIES, INC, hereby stipulate to extend all outstanding discovery deadlines set forth in the Stipulated Discovery Plan and Scheduling Order and state as follows:

a. This is the first extension sought of the deadlines stated in the Discovery Plan and Scheduling Order.

I.

Statement of Discovery Completed

1. Plaintiff's Early Case Conference List of Witnesses and Production of Documents Pursuant to N.R.C.P. 16.1 and supplements;
2. Defendants' Early Case Conference List of Witnesses and Production of Documents and supplements;
3. Plaintiff's Answers to Defendants' First Set of Request for Admissions.
4. Plaintiff's Answers to Defendants' First Set of Request for Production of Documents.
5. Plaintiff's Answers to Defendants' First Set of Interrogatories.
6. Defendants' Answers to Plaintiff's Request for Admissions.
7. Defendants' Responses to Plaintiff's Request for Production of Documents.
8. Defendants' Answers to Plaintiff's Interrogatories.
9. Deposition of Defendant on April 12, 2024.
10. Deposition of Plaintiff on March 24, 2024.

II.

Discovery to Be Completed

1. Expert Disclosures.
2. Rebuttal Expert Disclosures.
3. Depositions of Plaintiff's Experts.
4. Depositions of Defendants' Experts.

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III.

**Why Discovery Cannot be Completed in the
Time Provided by the Scheduling Order**

Plaintiff has requested prior MRI films to be obtained for the purpose of comparison. The requested films have not yet been received; therefore, an extension is necessary so that the films can be obtained.

PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY

- a. A Proposed Joint Pre-Trial Order on this case is Due by October 4, 2024.
- b. The parties, therefore, propose the following extension of the Scheduling Order deadlines, calculated as follows:
 1. The August 2, 2024 discovery cut off will be extended to October 2, 2024;
 2. The May 6, 2024 deadline for filing motions to amend pleadings will be extended to July 8, 2024;
 3. The May 6, 2024 deadline for initial expert disclosures will be extended to July 8, 2024;
 4. The June 4, 2024 deadline for rebuttal expert disclosures will be extended to August 5, 2024;
 5. The September 3, 2024 deadline for filing of dispositive motions will be extended to November 4, 2024;

1 For the foregoing reason, by this stipulation, the parties mutually request this Court
2 grant the forgoing extension of the Scheduling Order deadlines.

3 Dated this 30th day of April, 2024.

Dated this 30th day of April, 2024.

4 **DE CASTROVERDE LAW GROUP**

**WILSON ELSER MOSKOWITZ
EDELMAN & DICKER LLP**

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7 By: /s/Millie Mummery

By: /s/Brandon Verde

8 Kimberly Valentin

Brandon C. Verde, Esq.,

9 Nevada Bar No. 12509

Bar No.: 14638

10 Millie Mummery

6689 Las Vegas Boulevard South,

Nevada Bar No. 16594

Ste. 200

11 1149 S. Maryland Parkway

Las Vegas, NV 89119

Las Vegas, Nevada 89104

Attorney for Defendants Oumid Lina

12 *Attorney for Plaintiff Teresa De Jesus*
Santoyo

Akbar & The TJX Companies, Inc.

Santoyo Rodriguez v. Akbar et al.
2:23-cv-1520

ORDER


Upon consideration of the above Stipulation, the discovery deadlines shall be extended as follows:

1. Discovery cut off October 2, 2024;
2. Filing motions to amend pleadings July 8, 2024;
3. Initial expert disclosures July 8, 2024;
4. Rebuttal expert disclosures August 5, 2024;
5. Filing of dispositive motions November 4, 2024;

A separate Amended Scheduling Order will be issued; the Proposed Joint Pre-Trial Order deadline of October 4, 2024, shall be continued.

IT IS SO ORDERED.

DATED this 2nd day of May , 2024.



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

Respectfully Submitted by:

DE CASTROVERDE LAW GROUP

By: /s/ Millie Mummery

Kimberly Valentin

Nevada Bar No. 12509

Millie Mummery

Nevada Bar No. 16594

1149 South Maryland Parkway

Las Vegas, Nevada 89104

Attorneys for Plaintiff